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Response to SAPCB's Two Interim Proposals for Future PRGS Operations

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Regarding the two interim proposals, it is necessary first to establish a context for their origin. In fairness to the City, it agreed to its short term proposal, conceding to predictive modeling, to comply with the Board's request to negotiate in good faith in order to reach a compromise with both Mirant and DEQ on an interim operation. However, the result of negotiating was an impasse, followed by DEQ's submittal of a Draft Consent Order, endorsed by Mirant, and the City's Draft Order.

In reviewing both proposals, the **City's draft order is more protective of public health than the DEQ's, Mirant supported, draft consent order. However, neither adequately nor aggressively protects public health**, especially in the surrounding community in which I live. **Therefore, I support issuing a state operating permit, preferably a comprehensive permit, fully protective of all NAAQS.** If time does not allow for constructing such a permit, I support a short term permit regulating SO₂ with strict pre-set emission limits, followed by a comprehensive state operating permit regulating all criteria pollutants and in place by year's end.

Due to their continuing reliance on predictive modeling and trona usage, both of which have been shown to be problematic, I object to the interim proposals.

First, predictive modeling is denied by both federal and state regulations. This facility is the only plant in the US using such an irregular mechanism for emission control. Initiated by EPA's ACO and based on monitoring, predictive modeling has indicated only one monitored exceedance (2/23/07) at the facility. **However, since monitors were not placed at several impact points, especially on the south side of the plant, it is impossible to know how many monitored SO₂ exceedances would actually have occurred** during the ACO operation or whether public health has been protected. Further, had traditional and normative EPA-approved modeling been used, there would have been 22 exceedances of SO₂, according to verification modeling, during this ACO period.

Further, during the March 26th SAPCB meeting, a City representative stated that **"predictive modeling is unreliable" and "provides an illusion of environmental management but using a model that has essentially no skill is just an illusion."** Clearly, predictive modeling is a method to enhance production at the expense of protecting health and should not be continued under any operating scenario.

My second concern with the interim proposals is trona usage. **Trona, since its inception at the facility, has demonstrated multiple problems, both in public health issues and in plant operations.**

First and foremost, trona (sodium sesquicarbonate) was initiated at the plant without studies conducted to determine its effects on public health. In fact, both DEQ and Mirant trumpeted the product as harmless, “just like household baking soda, with the caveat that you wouldn’t want to breathe it just like you wouldn’t want to breathe baby powder.”

Yet, the **Material Safety Data Sheet (MSDS) for trona clearly indicates health problems associated with exposure to the product**, including “irritating digestive mucous membranes, eyes and skin. Inhalation may be irritating to the nose, throat and respiratory tract. Repeated exposure may cause nosebleeds. In the case of the eyes, may cause irritation, severe watering and redness.”

Solvay Chemicals Technical Publication brochure, “Safety and Handling T-200 Trona” (www.solvaychemicals.us) states that “safe handling of T-200 Trona is important due to the mild corrosiveness of the product (pH of 10.1). However, is a pH of 10.1 mild? The brochure goes on to state that trona may cause “minor eye and skin irritation” and that “personal protective equipment is required.” Mirant uses Solvay T-200 Trona at the Alexandria plant.

Contacting Solvair Products, which markets Solvay Trona T-200, in Houston, Texas, I spoke by phone to its business manager (1/11/07) who has visited the Alexandria Mirant plant and confirmed that trona “does increase flyash.” I mentioned to him that residents near the plant are complaining of eye and skin irritation.

Recalling that conversation, coupled with Mirant’s statement in the Apr.10th SAPCB discussions that it had “since the outset, proposed the trona system and the staff merge together as a solution to the downwash issue . . .,” it seems likely that the residents’ complaints of burning eyes and skin irritation are due to the fact that trona was introduced alone without ensuring proper and adequate dispersion.

This might also explain why the Solvair business manager, in my January 11th phone call, asked if the plant’s ESP efficiency had gotten better since the trona was introduced. Was he told that the stack merge project and trona system were to occur simultaneously? Is that why he asked me if the dispersion was better? When I answered “no,” he said, “Mirant would be the entity responsible for trona’s use, not Solvay.”

Not only is trona a health hazard, it also causes operational problems at the plant, both on the intake and output ends, as acknowledged by Mirant’s plant manager during the April 10th SAPCB discussion. On the input side, clogging and blockages occur and on the output side flow problems result in loss of precipitator fields which then cause opacity problems and breakdowns.

Due to the MSDS cited trona health hazards, the lack of public health studies on trona’s effects, the plant’s installation of the trona system without correcting poor dispersion caused by already existing downwash, thus possibly increasing trona’s

health effects in the surrounding population, and the ongoing trona operational problems at the facility, is it prudent or even responsible to continue using trona? I think not. Perhaps, it is time to install scrubbers.

In summary, I reiterate that neither of the interim proposals stringently protects public health. I support, instead, a state operating permit fully protective of NAAQS. If time constraints make this impossible, I ask for a short term permit regulating SO₂ with strict pre-set emission limits, followed by a comprehensive state operating permit strongly regulating all criteria pollutants and completed by December of this year. I support, as well, establishing a local air pollution control district in Alexandria.

I further request that any order considered must be for a short duration, protect the SO₂ five-minute guideline, limit NO_x to 1,019 tons during the ozone season and require trona information to be collected and reported. It should not condone a model evaluation study (MES) nor should it allow credit for a stack merger.

Thank you for the opportunity to respond to the interim proposals.

Elizabeth Chimento